1	DAYLE ELIESON		
2	United States Attorney District of Nevada TINA NAICKER, CSBN 252766 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105		
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•	Telephone: (415) 268-5611		
5	Facsimile: (415) 744-0134 E-Mail: Tina.Naicker@SSA.gov		
6	Attorneys for Defendant		
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9			
10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	SHARONE RANDOLPH,)	
13	Plaintiff,) Case No. 2:18-cv-00555-JAD-PAL	
14	v.	JOINT STIPULATION FOR EXTENSION OF	
15	NANCY A. BERRYHILL,	TIME AND [PROPOSED ORDER]	
16	Acting Commissioner of Social Security,) (SECOND REQUEST)	
17	Defendant.		
18	IT IS HERERY STIPLII ATED by the i	parties through their respective counsel of record that	
19	IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that		
20	the time for responding to Plaintiff's Motion for Remand be extended from November 29, 2018 to		
21	December 13, 2018. This is Defendant's third request for extension. Good cause exists to grant		
22	Defendant's request for extension. Counsel has a family emergency on the date of the current filing		
23	deadline. Counsel also has over 75+ active matters, which requires two or more dispositive motions a		
24	week until mid-January. In addition, Counsel has active civil rights and representative misconduct		

which requires multiple levels of review. Due to Counsel's unexpected leave, Counsel became behind

matters that require immediate investigation. Counsel also has a Ninth Circuit brief due next week,

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1	on her heavy workload. As such, Counsel needs additional time to adequately review the transcript		
2	and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in		
3	good faith with no intention to unduly delay the proceedings. The parties further stipulate that the		
4	Court's Scheduling Order shall be modified accordingly.		
5		Respectfully submitted,	
6	Dated: November 29, 2018	/s/ *Cyrus Safa	
7 8	23, 2010	(*as authorized by email on November 29, 2018) CYRUS SAFA	
9		Attorney for Plaintiff	
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11	Dated: November 29, 2018	DAYLE ELIESON United States Attorney	
12		DEBORAH LEE STÄCHEL	
13		Regional Chief Counsel, Region IX Social Security Administration	
14			
15	By	<u>/s/ Tina L. Naicker</u> TINA L. NAICKER	
16		Special Assistant U.S. Attorney Attorneys for Defendant	
17			
18		<u>ORDER</u>	
19	APPROVED AND SO ORDERED:		
20 21			
22	December 4, 2018		
23	DATED: December 4, 2018	HON PEGGY A. LEEN	
24		UNITED STATES MAGISTRATE JUDGE	
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CERTIFICATE OF SERVICE 1 2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the 3 JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER on the date 4 and via the method of service identified below: 5 CM/ECF: 6 Cyrus Safa 7 Law Offices of Lawrence D. Rohlfing 12631 E. Imperial Highway, Suite C-115 8 Santa Fe Springs, CA 90670 562-868-5886 9 Fax: 562-868-5491 Email: cyrus.safa@rohlfinglaw.com 10 Gerald Welt 11 Gerald M. Welt, Chtd. 703 S. 8th St. 12 Las Vegas, NV 89101 702-382-2030 13 Fax: 702-684-5157 Email: gmwesq@weltlaw.com 14 Attorneys for Plaintiff 15 16 Respectfully submitted this 29th day of November 2018, 17 18 /s/ Tina L. Naicker TINA L. NAICKER 19 Special Assistant United States Attorney 20 21 22 23 24 25

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